

Exhibit B

AFFIDAVIT OF MR. MEHDI MAKKI

I, Mehdi Makki, do depose and state under the penalty of perjury, the following:

1. I, Mehdi Makki
2. I have personal knowledge of the facts alleged herein.
3. I am competent and able to testify if called to do so.
4. I am the brother of Mohamad Makki, a Defendant in case no. 19-20176-2, here in the Eastern District of Michigan.
5. I am aware that there were discussions in that case about an amount that was transferred into my mother's bank account.
6. That amount was \$450,000.
7. The transfer, as I understood it, was done with the full knowledge and understanding of the government, through its attorneys on my brother's case, at the time.
8. Attached at Exhibit A, Bank Records, are bank statements from my mother's bank account.
9. The monies withdrawn during the period was used for payments except which \$1,500 are still available.
10. I hereby swear that that report, attached at Exhibit B, is true and accurate to the best of my knowledge.

11. Over the course of several months, the respective amount withdrawn out of my mother's account and put it into my account, and paid the expenses listed on the expense report (Exhibit B) from my account.

12. An additional \$10,000 was paid to Ayad Law, PLLC for its services in my brother Mohamed's legal case.

13. I am sorry that it took so long to collect these documents. I suffer from a slight mental deficiency and my brother was helping take care of me when he was not in custody.

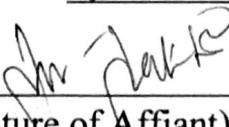
14. I am confident in my brother, Mohamed's, character that he will not betray my uncle and shame our family by attempting to flee justice.

15. I also vow to do everything in my power to ensure that my brother, Mohamed Makki, appears at all future hearings.

16. I will be in Court on Monday, January 13, 2020 to attest to the veracity of this affidavit.

FURTHER AFFIANT SAYETH NOT

Dated this Jan day of 11 2020.


(Signature of Affiant)

Mehdi Makki
(Printed name of Affiant)

Exhibit A



1-877-242-7837

Call Citizens' PhoneBank anytime for account information,
current rates and answers to your questions.

US102 BR828

MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account
Statement

1 OF 1

Beginning June 03, 2019
through June 17, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	.00
Checks	.00 -
Withdrawals & Debits	.00 -
Deposits & Credits	450,080.00 +
Current Balance	450,080.00 =

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.
Your account had at least 1 deposit posted during this statement period.
Your next statement period will end on July 16, 2019.

TRANSACTION DETAILS

Deposits & Credits

Date	Amount	Description
06/03	80.00	Deposit
06/07	450,000.00	Deposit

Previous Balance
.00

+ Total Deposits & Credits
450,080.00

= Current Balance
450,080.00

Daily Balance

Date	Balance	Date	Balance	Date	Balance
06/03	80.00	06/07	450,080.00		

NEWS FROM CITIZENS

--Saving can be easier than you think! With small changes in your spending, your savings can really add up! Packing your lunch 3x per week vs. eating out (on average a \$10 expense) could add up to \$1,560 in savings at the end of one year. Make a goal to pack your lunch a few times a week and set up an automatic transfer to your savings for the amount you saved and watch your savings add up! For more information visit a branch or call 888-821-3900. Member FDIC.

--Still writing checks for your bills? Try Bill Pay through Online Banking to quickly and easily pay your bills and manage your accounts. Plus, view check images in Online Banking as soon as they are paid to stay on top of your finances.



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US102 BR828

MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account Statement

1 OF 1

Beginning June 18, 2019
through July 16, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	450,080.00
Checks	.00 -
Withdrawals & Debits	15,019.99 -
Deposits & Credits	.00 +
Current Balance	435,060.01 =

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.

Your next statement period will end on August 15, 2019.

Previous Balance

450,080.00

TRANSACTION DETAILS

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
06/21	15,010.00	Withdrawal
07/16	9.99	Monthly Maintenance Fee

Total Withdrawals & Debits

15,019.99

Current Balance

435,060.01

Daily Balance

Date	Balance	Date	Balance	Date	Balance
06/21	435,070.00	07/16	435,060.01		

NEWS FROM CITIZENS

--Why wait for a statement to see your banking activity? Download our Mobile Banking App today to manage your money when it is convenient for you. *Wireless carrier charges may apply.

--Saving can be easier than you think! With small changes in your spending, your savings can really add up! Packing your lunch 3x per week vs. eating out (on average a \$10 expense) could add up to \$1,560 in savings at the end of one year. Make a goal to pack your lunch a few times a week and set up an automatic transfer to your savings for the amount you saved and watch your savings add up! For more information visit a branch or call 888-821-3900. Member FDIC.



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US102 BR828

MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account Statement

1 OF 2

Beginning July 17, 2019
through August 15, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	435,060.01
Checks	5,000.00 -
Withdrawals & Debits	11,719.72 -
Deposits & Credits	.00 +
Current Balance	418,340.29 =

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.

Your next statement period will end on September 17, 2019.

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

TRANSACTION DETAILS

Checks * There is a break in check sequence

Check #	Amount	Date	Check #	Amount	Date	Previous Balance
4212991	5,000.00	08/05				435,060.01
						-
						Total Checks
						5,000.00

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
08/01	8,010.00	Withdrawal
08/12	500.00	Chase Credit Crd Epay 190810 4248264509
08/12	85.00	Chase Credit Crd Epay 190810 4248263369
08/13	1,137.76	Bmwfinancial Svs Bmwfs Pymt 190811 253789343
08/13	1,137.76	Bmwfinancial Svs Bmwfs Pymt 190811 253789588
08/13	839.21	Colonial Savings Colonial S 081319 0045003622
08/15	9.99	Monthly Maintenance Fee

- **Total Withdrawals & Debits**
11,719.72

= **Current Balance**
418,340.29

Daily Balance

Date	Balance	Date	Balance	Date	Balance
08/01	427,050.01	08/12	421,465.01	08/15	418,340.29
08/05	422,050.01	08/13	418,350.28		

NEWS FROM CITIZENS

--Effective 10/5/2019, the Foreign Transaction fee for all debit card transactions made outside the United States and US Territories will be 3%. For any questions regarding this



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Checking Account Statement

2 OF 2

Beginning July 17, 2019
through August 15, 2019

Checking continued from previous page

NEWS FROM CITIZENS (continued)

change, please contact us at the number on the back of your debit card.

--Saving can be easier than you think! With small changes in your spending, your savings can really add up! Packing your lunch 3x per week vs. eating out (on average a \$10 expense) could add up to \$1,560 in savings at the end of one year. Make a goal to pack your lunch a few times a week and set up an automatic transfer to your savings for the amount you saved and watch your savings add up! For more information visit a branch or call 888-821-3900. Member FDIC.

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MACHAAL DIB-CHAHROUR
2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account Statement

1 OF 2

Beginning August 16, 2019
through September 17, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	418,340.29
Checks	.00 -
Withdrawals & Debits	35,479.71 -
Deposits & Credits	.00 +
Current Balance	382,860.58 =

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.

Your next statement period will end on October 16, 2019.

Previous Balance
418,340.29

TRANSACTION DETAILS

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
08/19	3,083.87	Roundpoint MT S Roundpoint 190816 2003321557
08/23	11,010.00	Withdrawal
08/27	1,528.09	Roundpoint MT S Roundpoint 190826 2003321557
09/03	900.00	Chase Credit Crd Epay 190902 4280924074
09/03	500.00	Chase Credit Crd Epay 190902 4280923064
09/10	5,000.00	Withdrawal
09/10	300.00	Cardmember Serv Elect Pymt 190909 *****0223
09/13	1,137.76	Bmwfinancial Svs Brmws Pymt 190912 255284388
09/16	2,000.00	Chase Credit Crd Epay 190913 4300765285
09/17	10,010.00	Withdrawal
09/17	9.99	Monthly Maintenance Fee

Total Withdrawals & Debits

35,479.71

Current Balance

382,860.58

Daily Balance

Date	Balance	Date	Balance	Date	Balance
08/19	415,256.42	09/03	401,318.33	09/16	392,880.57
08/23	404,246.42	09/10	396,018.33	09/17	382,860.58
08/27	402,718.33	09/13	394,880.57		

NEWS FROM CITIZENS

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2021 N GULLEY RD
DEARBORN HEIGHTS MI 48127-3439

Checking Account Statement

1 OF 1

Beginning September 18, 2019
through October 16, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	382,860.58
Checks	.00 -
Withdrawals & Debits	56,819.99 -
Deposits & Credits	.00 +
Current Balance	326,040.59 =

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

The monthly maintenance fee of \$9.99 will be waived if at least 1 deposit is posted to your account before the end of your statement period.

Your next statement period will end on November 18, 2019.

Previous Balance

382,860.58

TRANSACTION DETAILS

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
09/23	300.00	Chase Credit Crd Epay 190922 4313108749
10/04	55,510.00	Withdrawal
10/07	700.00	Chase Credit Crd Epay 191003 4331199712
10/07	300.00	Chase Credit Crd Epay 191003 4331201225
10/16	9.99	Monthly Maintenance Fee

Total Withdrawals & Debits

56,819.99

Current Balance

326,040.59

Daily Balance

Date	Balance	Date	Balance	Date	Balance
09/23	382,560.58	10/07	326,050.58	10/16	326,040.59
10/04	327,050.58				

NEWS FROM CITIZENS

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Checking Account Statement

1 OF 1

Beginning October 17, 2019
through November 18, 2019

Checking

SUMMARY

Balance Calculation

Previous Balance	326,040.59
Checks	.00 -
Withdrawals & Debits	7,830.52 -
Deposits & Credits	.00 +
Current Balance	318,210.07 =

The \$9.99 monthly maintenance fee is waived when you make at least 1 deposit that is posted before the end of your statement period.

No deposit made.

Your next statement period will end on December 16, 2019.

MACHAAL DIB-CHAHROUR
TTEE FOR TARIK MAKKI
One Deposit Checking
453351-250-9

TRANSACTION DETAILS

Withdrawals & Debits

Other Withdrawals & Debits

Date	Amount	Description
10/22	1,000.00	Chase Credit Crd Epay 191021 4358850232
11/01	1,137.76	Bmwfinancial Svs Bmwfs Pymt 191031 257758224
11/05	27.25	Deluxe Check Check/Acc. T91101
11/08	5,467.60	Safeco Ins. CO. Tel Paymnt 191108 72113113148
11/18	187.92	Huntington Card Payment 191118 C 98334975
11/18	9.99	Monthly Maintenance Fee

Previous Balance
326,040.59

Total Withdrawals & Debits
7,830.52
Current Balance
318,210.07

Daily Balance

Date	Balance	Date	Balance	Date	Balance
10/22	325,040.59	11/05	323,875.58	11/18	318,210.07
11/01	323,902.83	11/08	318,407.98		

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Docket Text:

Minute Entry for proceedings before District Judge Linda V. Parker: Nebbia Hearing on 12/18/2019, as to Mohamad Ali Makki. Disposition: Nebbia hearing continued until 1/13/20 at 11:00 am. Prior to the hearing, counsel for Defendant will provide to the Government and the Court (1) the documentation needed to trace the source of funds Mr. Wahid Makki used to purchase the commercial building he is offering to put up as collateral for Defendant's bond and (2) documentation tracing the \$400,000 - \$600,000 Defendant transferred to an account in his mother's name (e.g., the status of the account and the funds). The Government agrees not to act on its notice of intent to withdraw the Rule 11 Plea Agreement until counsel for Defendant and the Government meet and confer. (Court Reporter: Jodi Matthews) (Defendant Attorney: Jeffrey G. Collins, Mazen A. Ghaith, Nabih H. Ayad) (AUSA: Philip A. Ross) (RLou)

[2:19-cr-20176-LVP-EAS United States of America v. Makki et al](#)

Status Conference (No document attached)

Docket Text:

Minute Entry for proceedings before District Judge Linda V. Parker: Status Conference as to Mohamad Ali Makki held on 12/18/2019.(Court Reporter: None Present, Not on the Record) (Defendant Attorney: Jeffrey G. Collins, Mazen A. Ghaith, Nabih H. Ayad) (AUSA: Philip A. Ross) (RLou)

Exhibit B

ACTIVITY

- 565 TMOBILE / TRAVEL / SECURUS
- 3475 WU > T.M.
- 1395 GROCERY/ WALMART / MEDS/ KROGER/ DAD
- 2030 TMOBILE/ GROCERY/ TRAVEL/ GAS
- 2820 DELTA/ MEDBILL/ PHARMACY / WIRELESS / GAS
- 1585 ACCOUNTANT / ALARM/ MISC
- 1085 LEGAL / WATER / RFS MIDLAND / SECURUS / CVS
- 915 SECURUS / WIRELESS / COMCAST / GAS
- 2000 SECURUS / DTE / GROCERY / WALGREENS
- 915 DTE / SECURUS / CORR LINKS / WALGREENS / MEDS
- 1650 GREENLAND / GAS / GROCERY
- 960 MEIJER / GROCERY / COMAST
- 1485 WIRELESS / CALL FWD / GREENLAND
- 19420 TAX X3 UNITS / COMCAST / TRAVEL / CALLS
- 1330 MEIJER / GROCERY / WATER BILL
- 2925 TAXES / DEED / BIN / ACOUNTANT /
- 5420 DIFFERED ACT
- 2550 WU > MOM >> LEB
- 300 WU > INMATE
- 1000 CREDIT CARD BILL
- 820 SEPT SECURUS / H20 WIRELESS / DTE
- 2025 AUG GAS / WALGREENS / BILLS
- 915 SECURUS / TRANSFERS
- 7500 PAYMENTS / CASH
- 5000 TRANSFERRED / COVER EXPENSES / CASH
- 3000 MOM >> MEHDI
- 220 TRU GREEN
- 1000 SHADIA
- 760 HUNT ACT
- 980 DISCOVER
- 1000 MAINTENCE / MEDICAL RELATED
- 2515 COLONIAL / 3 PAYMENTS X838
- 3174 PRIMELENDING
- 19470 CLOSING – HOUSE